



AMY N. WILLIAMSON
ATTORNEY AT LAW

September 5, 2022

VIA EMAIL
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Benjamin D. Webb
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400 Holiday Drive, Ste 210
Pittsburgh, PA 15220

Re: *Renee Zinsky vs. Michael Russin et. al*
2:22-cv-00547-MJH
For Settlement Purposes Only Pursuant to Fed.R.Civ.P. 408

Dear Ben:

Please allow this correspondence to follow up on our conference with Judge Horan on September 1st. Judge Horan stated, in no uncertain terms, that it would be in your client's best interest to make a good faith attempt to resolve this matter at this time. More specifically, Judge Horan stated that, based on her review of this case, she was ***"appalled"*** by your client's conduct and couldn't ***"believe that anyone could be so brash"*** given his ongoing exposure in this case. She went on to explain that Mr. Russin continues to ***"shoot himself in the foot"*** which ***"makes the Plaintiff's case for her"***. Judge Horan went so far as to state that if Mr. Russin does not settle this matter near term, he will have ***"more problems than this lawsuit"*** and risks ***"extensive exposure with significant damages"*** going forward. The Judge asked you to ***"get your client under control"*** and declared that his behavior ***"would not be tolerated"*** by the Court.

For those reasons, Judge Horan stated that she would not be mandating ADR at this time. Instead, the Court recommended that Plaintiff provide a settlement demand to all of the Defendants in this case. I have copied counsel for the other Defendants hereto.

[REDACTED]

Before addressing Plaintiff's demand, I would like to take this opportunity to elaborate on Judge

Horan's concerns with regard to Mr. Russin's ongoing conduct. Incredibly, *within two days following the Court's comments and instructions*, Mr. Russin continued to conduct himself in the same reprehensible manner. For example, on September 3, 2022, Mr. Russin published a podcast titled *How to Be a Closer, Fuel for the Fire, and False Gospel Preachers*. At that time, Mr. Russin made a variety of statements (presumably related to closing sales) in a brash, appalling, and aggressive manner to include the following:

- *I've always been a closer. I'm not tooting my own horn. It's just a fact ... It doesn't matter what it is ... closing in business and in life are the same. Everything in life is closing ... **If you're a man ... you got to close a woman.***
- *Closing is such an essential skill in life... **You can't be a dog, especially as a man and not know how to close.***
- *At the end of the day, whoever it is, a woman, bank teller, loan officer, girl across from you at the bar... the first thing they are buying is you ... People are animals.*
- *I got a guy that works at one of my organizations ... **This guy can smell when women are ovulating.***
- ***I can tell you right now, there's no human being on this planet that can take me out of the game** ... when they see you go through massive amounts of adversity and still come out on top, they want to drag you right down into the pit ... they have such low self-worth that they can't stand to see people win ... **They don't have the balls** to go out and win ... You gotta grab and pull him back down ... **in this bucket of misery and shit with us.***
- ***So when someone else becomes so focused on you that they want to take you out of the game** and you just keep going out and working and winning... like our recruiting company just had its biggest week ever ... we built a million dollar a year business within 6 months.*
- *Keep denting me, go ahead... bounce me around, beat me up I love it. **I have a sick relationship with pain. It makes me so much better...** Thank you haters! Haters make me greater!*
- *But you don't want to hyper fixate on that ... **Then you start feeding your dark side too much... That's when you want to lash out. That's when you do something that you shouldn't do.***
- *You can't jeopardize the rest of your life over a hater... **You go to jail for felonious assault.***
- ***I'm not strong enough. I'm not good enough. We are all inherently wicked.***
- ***It's not that I'm not good enough. I'm not good all.***
- *I've struggled with this a lot in the past couple of months... I feel worse now than I ever have in my life ... **I am more convicted and disgusted with myself now than I have ever been in my entire existence on this planet.***
- *The process of sanctification ... it never ends ... **Because when you remove the big sins, you just become aware of the medium ones... Like ... I'm not having sex with a bunch of people or doing drugs ... or cheating on my wife** ... Then you become violently aware of the small things ... You should feel worse than you ever have in your life ... you should be remorseful.*
- *Please donate. Please help us.*

Similarly, on the same day (September 3, 2022), Mr. Russin posted a photograph of himself with the caption **"War Ready"** on social media. Of course, these statements are no different than Mr. Russin's other public statements such as **"Money Grubbing Whores"** (referencing women who claim sexual assault

and sexual harassment), *“I do everything fast, even cummies”*, or *“Vax this Dick”* but they are even more shocking and remarkable given the timing, i.e. days following Judge Horan’s clear and direct reprimand of said conduct.

There are multiple witnesses who will testify that these types of comments are, and continue to be, typical for Mr. Russin in the AIL office and at other AIL work settings for years, including the past 6 months. The witnesses will testify that Mr. Russin’s recent comments are often followed by even more brash statements such as *“What are you going to do about it, fire me?”* As you may know, Mr. Russin has voluntarily published the same statements over the past six (6) months in other capacities.

These are merely the “highlights” of Mr. Russin’s most recent brash and appalling conduct. As you know from Plaintiff’s Amended Complaint, there are droves of similar vulgar, misogynistic, aggressive, and violent comments and conduct on behalf of Mr. Russin in his capacity as an agent of AIL and Arias Agencies over the years. Although Mr. Russin’s conduct is perhaps the most vile and egregious that I am aware of, make no mistake... there are just as many examples of other male agents’ depraved conduct that will be evidence of the toxic and hostile work environment which Defendants have subjected Plaintiff to over the past 3.5 years. Of course, the extensive list of witnesses (including Mr. Russin’s wife, Geneva Russin), documents, texts, photographs, videos, and other evidence will be shared over the course of discovery near term.

As you may know, AIL acknowledged Mr. Russin’s appalling conduct by allegedly attempting to terminate his contract on or about February 2022. AIL’s counsel referred to the alleged termination as a “remedial measure” resulting from AIL’s investigation of Plaintiff’s claims of sexual harassment. Yet, unbelievably, Mr. Russin continues to work on behalf of AIL through present. Mr. Russin performs professional services on behalf of AIL, receives income from AIL, works out of the same AIL office¹, manages and attends AIL meetings, and continues to manage the same team of AIL agents as he did prior to his alleged termination. Typically, I would assume that you are already aware of these facts. Given your recent inquiries about Mr. Russin’s conduct², however, I wanted to be sure to clarify any such confusion with all defense counsel. Defendants’ ongoing inability to provide Plaintiff with a safe working environment was clearly reflected by Judge Horan’s concerned comments about the *“escalating”* nature of Defendants’ exposure.

Whether Defendants refer to Mr. Russin as a “consultant”, “contractor”, or otherwise, it is of no matter since he continues to function as an agent on behalf of the Defendants, and in a leadership role at that ... just as he did during his daily drug and alcohol abuse, just as he did during countless episodes of sexual harassment, just as he did during his felonious criminal charges and convictions, and just as he did during an involuntary commitment to a mental health facility. All of which occurred publicly while Mr. Russin was hired, employed, retained, and celebrated as a high-ranking leader by Simon Arias and AIL.

Based on Plaintiff’s employment experience alone, Defendants’ inability to provide a safe work environment was not a mere oversight, but rather a choice. Perhaps the most blatant example is that nothing has actually changed since AIL admitted to Mr. Russin sexually harassing Plaintiff and then

¹ AIL and/or Arias Agencies’ Portland, Maine office.

² Contrary to your representations, this there is a significant amount of evidence to support Plaintiff’s claims that Mr. Russin’s private conduct is just as vile and offensive as his public “persona”.

misrepresenting Mr. Russin's termination as a "remedial measure". Similarly, Plaintiff's complaints of sexual harassment and insurance fraud were concealed by Defendants for at least four months after being reported to Simon Arias. And, for an additional five months, Globe Life and AIL continued to recognize Mr. Russin and Mr. Arias with "leadership" awards and generous incomes ... all the while Plaintiff was traumatized and completely unable to work. What is more, Globe Life and the Defendants never even bothered to interview Plaintiff in connection with the alleged investigation of her documented reports of insurance fraud. What is more, that doesn't even address the experiences of numerous other witnesses who will testify to eerily similar experiences while working for the Defendants.

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Please feel free to reach out should you have any questions or concerns. Otherwise, I look forward to hearing from you once you have an opportunity to confer with your client(s).

Sincerely,

/s/ Amy N. Williamson

cc: Jean Novak, Esq. (on behalf of Simon Arias III, S.A. Holdings, LLC, and Arias Agencies)
Anne Dana, Esq. (on behalf of American Income Life Insurance Company)